

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

TECSEC, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:10-cv-115-LO/TCB
v.	)	
	)	
ADOBE INC., et al.,	)	
	)	
Defendants.	)	
	)	
	)	
	)	

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**JOINT NOTICE OF THE PARTIES' DISPUTES RELATED TO THE PROPOSED  
JOINT DISCOVERY PLAN, PROPOSED STIPULATED PROTECTIVE ORDER AND  
PROPOSED STIPULATED ORDER REGARDING THE PRODUCTION OF  
DOCUMENTS AND ELECTRONICALLY STORED INFORMATION**

The Parties (Plaintiff TecSec, Incorporated ("TecSec") and Defendants Cisco Systems, Inc., Oracle Corp., Oracle America, Inc., SAS Institute, Inc., SAP America, Inc., SAP AG, Software AG USA, Inc., Software AG, and Sybase, Inc. (each a "Party," and collectively, the "Parties")) have met and conferred regarding a proposed joint discovery plan, a proposed stipulated protective order and a proposed stipulated order regarding the production of documents and electronically stored information.

**I. PROPOSED JOINT DISCOVERY PLAN (EXHIBIT A)**

The Parties have one area of disagreement on the proposed Joint Discovery Plan. Defendants propose the following language regarding the number of depositions: "Pursuant to Rule 30(a), Plaintiff may take no more than ten depositions per Defendant, not including experts, absent stipulation by that Defendant or obtaining leave of Court." TecSec does not agree to this language.

This dispute is highlighted on page 3, in Section 2(B)(i)(f) of the attached discovery plan.

## **II. PROPOSED STIPULATED PROTECTIVE ORDER (EXHIBIT B)**

The Parties have one area of disagreement on the proposed Stipulated Protective Order. The area of disagreement is regarding page limits on source code print outs. TecSec proposes the following limitation on source code print outs: “A reasonable number shall be defined as no more than 40 contiguous pages or 2,500 total pages of a Producing Party’s source code per accused product.” Defendants propose the following limitation on source code print outs: “A reasonable number shall be defined as no more than 30 contiguous pages or 500 total pages of a Producing Party’s source code per accused product. If the Reviewing Party believes, after review of the source code, that more than 30 contiguous pages or more than 500 total pages of a Producing Party’s source code per accused product are necessary, the parties agree to meet and confer regarding potential additional production of source code pages.”

This dispute is highlighted on page 24, in Section 10(d) of the attached protective order.

## **III. PROPOSED STIPULATED ORDER REGARDING THE PRODUCTION OF DOCUMENTS AND ELECTRONICALLY STORED INFORMATION (EXHIBIT C)**

The Parties have no areas of disagreement on this Order.

Dated: September 20, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of September, 2019, a true and correct copy of the foregoing pleading or paper was served using the Court's CM/ECF system, with electronic notification of such filing to all counsel of record.

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